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**REMARKS**Drawings

The Office Action of August 23, 2004, requests the submission of formal drawings. Formal drawings were submitted on January 5, 2004, and are currently available on PAIR. The objection to the drawings should therefore be withdrawn. In an effort to move the case forward and for the Examiner Corrielus' examining convenience, Applicants submit with this Response a copy the formal drawings as filed on January 5, 2004.

Claim Rejections – 35 U.S.C. § 103

Claims 1-45 stand rejected under 35 U.S.C § 103(a) as unpatentable over U.S. Patent No. 6,259,367 to Klein in view of U.S. Patent No. 6,526,158 to Goldberg. The proposed combination of Klein and Goldberg cannot establish a prima facie case of obviousness. To establish a prima facie case of obviousness, three basic requirements must be met. Manual of Patent Examining Procedure §2142. The first requirement of a prima facie case of obviousness is that the combination of Klein and Goldberg must teach or suggest all of the limitations of claims 1-45. In re Royka, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974). The second requirement of a prima facie case of obviousness is that there must be a suggestion or motivation to combine Klein and Goldberg. In re Vaeck, 947 F.2d 488, 493, 20 USPQ2d 1438, 1442 (Fed. Cir. 1991). The third requirement of a prima facie case of obviousness is that there must be a reasonable expectation of success in the combination of Klein and Goldberg. In re Merck & Co., Inc., 800 F.2d 1091, 1097, 231 USPQ 375, 379 (Fed. Cir. 1986).

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Klein and Goldberg Do Not Disclose  
All of the Limitations of Claims 1-45

The combination of Klein and Goldberg does not disclose all of the limitations of claims

1-45. Independent claim 1 claims:

A method of detecting interactions among objects associated with RFID tags, the method implemented in computer software operating in a services gateway, the services gateway comprising server software installed and operating upon a computer, the method comprising the steps of:

reading, through an RFID reader, a first RFID identification code from a first RFID tag associated with a first object;

reading, through the RFID reader, a second RFID identification code from a second RFID tag associated with a second object; and

inferring from an interactions database an interaction between the objects;

wherein the interactions database comprises an interactions record representing the interaction between the objects, the interactions record comprising an interaction identification field having a value identifying the interaction between the objects and at least two RFID identification fields; and

wherein the readings of RFID identification codes and the inferring of an interaction are carried out through Java servlets in an OSGI-compliant service bundle installed and operating in the service gateway.

The Office Action of August 23, 2004, states that Klein discloses "reading, through an RFID reader, a first RFID identification code from a first RFID tag associated with a first

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object" at column 2, lines 12-18, and "reading, through the RFID reader, a second RFID identification code from a second RFID tag associated with a second objects" at column 2, lines 28-39, and "inferring from an interactions database an interaction between the objects" at column 2, lines 28-39. In fact, Klein does not disclose reading more than one RFID identification code for more than one object and inferring from an interactions database an interaction between the objects. Klein discloses a lost and found system for tracking a single object at a time. The cited paragraphs of Klein makes no mention of interactions between objects. Goldberg discloses taking pictures of people wearing an RFID tag and also makes no mention of interactions between objects. As such, the combination of Klein and Goldberg do not disclose each and every element of independent claim 1. The combination of Klein and Goldberg therefore cannot establish a prima facie case of obviousness and the rejection should be withdrawn.

The Office Action of August 23, 2004, admits that Klein does not explicitly disclose the claim limitation reciting "wherein the interactions database comprises an interactions record representing the interaction between the objects, the interactions record comprising an interaction identification field having a value identifying the interaction between the objects and at least two RFID identification fields" and the claim limitation reciting "wherein the readings of RFID identification codes and the inferring of an interaction are carried out through Java servlets in an OSGI-compliant service bundle installed and operating in the service gateway." The Office Action states that Goldberg discloses these claim limitations at column 2, lines 55 - column 3, line 5; column 6, lines 33-42; column 9, lines 20-65; line 5. The cited columns of Goldberg actually disclose taking pictures of people wearing an RFID tag. The cited columns of Goldberg do not disclose interactions between objects, an interactions record representing the interaction between the objects, inferring of an interaction, Java servlets, OSGI-compliant service bundles, or a service gateway. Goldberg never even mentions interactions between objects, an interactions record representing the interaction between the objects, inferring of an interaction, Java servlets, OSGI-compliant service bundles, or a service gateway. The combination of Klein and Goldberg do not disclose each and every element of

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independent claim 1, and therefore, cannot support a prima facie case of obviousness. The rejection should be withdrawn.

#### Dependent Claims 2-15

Claims 2-15 depend from independent claim 1 and include all of the limitations of independent claim 1. Because the combination of Klein and Goldberg does not disclose each and every element of independent claim 1, the combination cannot disclose each and every element of dependent claims 2-15. The combination of Klein and Goldberg therefore cannot establish a prima facie case of obviousness of claim 2-15. The rejection of claims 2-15 should be withdrawn.

#### System and Computer Program Claims 16-45

The Office Action of August 23, 2004, rejects claims 16-45 on the following grounds (quoting from the Office Action):

Claims 16-30 are system for performing the method of claims 1-15. They are, therefore, under the same rationale.

Claims 31-45 are computer program product embodied in the computer for executing the method of claims 1-15. They are, therefore, rejected under the same rationale.

Claims 16-30 and claims 31-45 claim respectively system and computer program product aspects of corresponding method claims 1-15. Because the combination of Klein and Goldberg does not disclose each and every element of claims 1-15, the combination of Klein and Goldberg does not disclose each and every element of claims 16-45. The combination of Klein and Goldberg cannot therefore establish a prima facie case of obviousness with respect to claims 16-45 and the rejection should be withdrawn.

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There Is No Suggestion or Motivation  
to Combine Klein and Goldberg

There is no suggestion or motivation to combine Klein and Goldberg. There is no suggestion or motivation to combine Klein and Goldberg because the proposed combination changes the principle of operation of Klein. If the proposed combination of the prior art would change the principle of operation of a prior art invention being combined, then the teachings of the references are not sufficient to render the claims prima facie obvious. In re Ratti, 270 F.2d 810, 123 USPQ 349 (CCPA 1959). Klein discloses a system for identifying and returning a lost object bearing an RFID tag. Goldberg discloses a method of taking pictures of a person who is not lost and is wearing an RFID tag. To modify a Klein to identify objects that are not lost would change the principle of operation of Klein. There is therefore no suggestion or motivation to combine Klein or Goldberg and the proposed combination cannot support a prima facie case of obviousness. The rejection should be withdrawn.

There Is No Reasonable Expectation of Success  
In The Combination of Klein and Goldberg

There is also no reasonable expectation of success in the combination of Klein and Goldberg. Klein discloses a system for identifying and returning a lost object bearing an RFID tag. Goldberg discloses a method of taking pictures of a person who is not lost and is wearing an RFID tag. Taking pictures of a person who is not lost will not work to identify a lost object. The combination of Klein and Goldberg does not work and therefore cannot support a prima facie case of obviousness. The rejection should be withdrawn.

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Conclusion

The proposed combination of Klein and Goldberg fails to establish a prima face case of obviousness because the proposed combination does not teach each and every element of claims 1-45, there is no suggestion or motivation to make the proposed combination, and there is no reasonable expectation of success in the proposed combination. Applicants respectfully request reconsideration of claims 1-45.

The Commissioner is hereby authorized to charge or credit Deposit Account No. 09-0447 for any fees required or overpaid.

Respectfully submitted,

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